



Registry of Interpreters for the Deaf, Inc.

February 15, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

VIA ELECTRONIC FILING

Re: Notice of *EX PARTE* Meeting: CG DOCKET NOs: 10-51 and 03-123

Dear Ms. Dortch:

On February 13, 2012, Janet L. Bailey, Government Affairs Representative for the Registry of Interpreters of the Deaf (RID), joined stakeholders in a roundtable discussion on the Video Relay Service (VRS) Further Notice of Proposed Rulemaking (FNPRM) released on December 15, 2011. RID is appreciative of the opportunity to meet with the distinguished panel of representatives from the Federal Communications Commission (FCC) including Karen Strauss, Gregory Hlibok, Eliot Greenwald, Robert Aldrich, and Richard Hovey of the Consumer and Governmental Affairs Bureau; Paul de Sa and Nick Alexander of the Office of Strategic Planning; and Henning Schulzrinne, Chief Technology Officer.

During the roundtable discussion Janet Bailey, on behalf of RID, specifically made comment on the issue of defining “quality” within the VRS program.

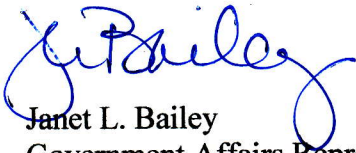
1. In particular, RID discussed the need for specialized education, experience, credentials, training and support for the Communication Assistants (CAs) expected to handle emergency calls. To date, providers have met the requirement for immediate answering by sharing the burden across the entirety of their workforce, regardless of their qualifications. By routing emergency calls to the next available CA we are doing a disservice to the consumers in need of emergency help. Worse, the use of Communication Assistants who have limited experience, little or no training and no support is detrimental to the goal and outcomes of an emergency call.
2. RID believes that the definition of “Functional Equivalence” cannot be measured by speed of answer or technology; but instead must be measured by the success of the calls. Due to the fact that the FCC has long defined the interpreter as a transparent conduit or dial tone, the industry has largely ignored the need to recognize interpreting as the core service provided to consumers. This has led to a dismissal of the concerns and expertise professional interpreters, who serve as Communication Assistants, provide as essential contributors to the entire structure. It has also led to a change in the industry practice of hiring only certified and experienced community interpreters to hiring pre-certified and student signers to be trained on the job.

There are currently more than 9,500 RID certified interpreters with another 700 or more who have begun the certification process with RID. There are certainly sufficient resources within the nation to staff and assist in supporting a strategic direction within the VRS program to provide the highest quality services that will ultimately lead to successful and functionally equivalent calls for deaf and hard of hearing persons.

3. RID recommended setting minimum standards for certification for all working CAs. The need for this type of standard was underscored when a provider representative suggested that providers be paid more for hiring certified interpreters. Consumers deserve to be represented accurately when making their calls and deserve to have access to the information on the other end of the line. Therefore, certified interpreters who are experienced, educated professionals should be the standard and not a premium service.
4. RID supports comments made recommending the use of routing systems to connect consumers with interpreters who best match their needs or who have experience with specialty language or topics. This will be much easier to assure with a highly qualified, educated and credentialed workforce. These comments, made by providers and consumers alike, testify to the feasibility of improving the current service, not with speed, not with technology, but by supporting the core processes – interpreting.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), a copy of this letter is being filed electronically today. Should you have questions or require clarification on any issue, please do not hesitate to contact me at 703-838-0030.

Sincerely,



Janet L. Bailey
Government Affairs Representative

cc: Karen Strauss
Gregory Hlibok
Eliot Greenwald
Robert Aldrich
Richard Hovey
Nicholas Alexander
Henning Schulzrinne